

June 30, 2014

Docket No. EPA-HQ-OPP-2014-0195
Office of Pesticide Programs
Environmental Protection Agency
Mailcode 28221 T
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Docket No. EPA-HQ-OPP-2014-0195: Proposed Registration of Enlist Duo

As a grower of corn and soybeans in Ohio I am submitting these comments on the above-captioned docket posted by the Office of Pesticide Programs of the Environmental Protection Agency (EPA). I strongly support the EPA's proposal to grant a registration for Enlist Duo herbicide containing 2,4-D choline salt and glyphosate.

Agriculture's ability globally to continue to push the envelope of technological breakthroughs is nothing short of amazing. Many countries across the globe are on an incredible pace, and in tremendous competition, to be at the front of the line with regards to placing ideas and new products in the hands of consumers.

I am one of four partners in my family farming operation which include my father, Gary; my mother, Carol; and my wife, Jill. Our operation consists of 4,500 acres of corn soybeans and wheat and is located in Delaware Ohio.

Our agricultural industry has seen tremendous leaps forward in our ability to efficiently and safely produce enough food, feed, fiber and fuel for a rapidly growing population. One of the most significant reasons we have been able to sustain such production leaps has been through the advancements in crop protection technology used in conjunction with seed traits developed through biotechnology. Tools such as Enlist Duo are critical in facing our most pressing problem today: weeds resistant to glyphosate.

As I combined soybeans last fall, I came across a portion of the field with some problems weeds that simply were not being controlled with the current chemistries that we have available to us. The area of the field where the weeds were competing with our crops yielded ten bushels less per acre than the area where the weeds were not present. These weeds and the instances of these weeds are increasing all across the country and simply must be dealt with if we are to continue to provide the food, feed, fiber, and fuel needed to sustain our growing population. The number one tool for agricultural growers to control resistant weeds is the rotation of herbicide modes of action – unfortunately, there has been a limited number of modes of action available for herbicide resistant cropping systems until products such as Enlist have been proposed.

More importantly however, than a significant monetary loss, may be the inability to continue no-till and minimum till practices – the loss of which could result in increased soil erosion and leaching of chemicals. My farm is close to the water supply for a large city and nothing is more important to us than maintaining our soil and safe water supply. Being good stewards of the land is most critical because quality land is the base for a successful farming operation.

Managing resistant weeds has become a high priority for our farming operation with a corresponding focus on weed resistance management in our operating plan. We need these products to remain viable for years to come. Given the location of our farming operation, we are also extremely sensitive to off-target movement onto the many sensitive crops grown in our area.

For these reasons, we are committed to the proper stewardship and utilization of Enlist Duo over the top of Enlist crops rather than traditional 2,4-D. In addition, Dow AgroSciences' commitment to take away our access to the technology is a risk we are not willing to take in an effort to save a few dollars. This potential loss of the use of the Enlist seed technology is arguably the most powerful enforcement tool that could be proposed.

I would also urge EPA to expand the registration of Enlist Duo beyond the use of a single nozzle (we use many nozzles that achieve the droplet size and spray pattern that would achieve the same performance) and the six states identified. Weed resistance is prevalent across the Midwest and South and effectively managing this issue needs to include all of the major growing regions.

I strongly support the registration of Enlist Duo and urge you to quickly move forward with the registration. Any further delay in the registration of this herbicide denies me an important tool critical to fighting weeds and maximizing my yields and makes it harder to compete with growers globally that have access to this technology.

Thank you for your consideration of my comments.

Respectfully,
John H. Davis